

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**ASSURANCE WIRELESS' ANNUAL  
ELIGIBLE TELECOMMUNICATIONS CARRIER REPORT**

**June 29, 2016**

## **I. INTRODUCTION**

Assurance Wireless of South Carolina, LLC (“Assurance Wireless” or “Company”) submits this Annual Report, pursuant to Order No. 2011-76, and respectfully requests the Commission certify its eligibility for low-cost support from the federal universal service fund for calendar year 2017. Assurance Wireless is a competitive carrier that has been designated as an Eligible Telecommunications Carrier (“ETC”) solely for purposes of offering prepaid wireless telecommunications services supported by the Lifeline program. Its ETC designation does not entitle it to receive high-cost support from the federal universal service fund.

In 26 S.C. Code Ann. Regs. 103-690.1 the Commission specifies its annual reporting requirements for ETCs. Please find herein information responsive to those requirements.

## **II. COMPLIANCE WITH CTIA CONSUMER CODE FOR WIRELESS SERVICE AND OTHER SERVICE QUALITY AND CONSUMER PROTECTION RULES**

The Commission requires a wireless ETC to certify that it is complying with all applicable service quality standards and consumer protection rules, e.g., the CTIA Consumer Code for Wireless Service.<sup>1</sup> Assurance Wireless affiliate Virgin Mobile USA, L.P. became a voluntary signatory to the Consumer Code in 2004. Since adopting the Consumer Code, Virgin Mobile and its affiliates have implemented the policies and practices required of signatories. This means that Assurance Wireless has implemented policies so that it:

- (1) Discloses rates and terms of service to consumers.
- (2) Makes available maps showing where service is generally available.
- (3) Provides contract terms to customers and confirms changes in service.
- (4) Allows a trial period for new service.
- (5) Provides specific disclosures in advertising.
- (6) Separately identifies carrier charges from taxes on billing statements.
- (7) Provides customers the right to terminate service for material changes to contract terms.

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<sup>1</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(a), 103-690.1(B)(b)(5).

- (8) Provides ready access to customer service.
- (9) Promptly responds to consumer inquiries and complaints received from government agencies.
- (10) Abides by policies for protection of customer privacy.

Assurance Wireless certifies that it is in compliance with all applicable service quality and consumer protection requirements and standards, including the CTIA Consumer Code for Wireless Service. A copy of CTIA's most recent certification issued to Assurance Wireless and its affiliates is included as **Attachment 1**. Assurance Wireless has complied and will continue to comply with the principles set forth therein.

### **III. ASSURANCE WIRELESS' LIFELINE REPORTING**

#### **A. Assurance Wireless' Unfulfilled Requests For Service**

An ETC must make an annual report of the number of requests for service from potential customers within its service areas that were unfulfilled for the most recent calendar year.<sup>2</sup> The filing must also detail how it attempted to provide service to those potential customers. Assurance Wireless did not have any unfulfilled requests for service from qualified applicants in 2015.

#### **B. Assurance Wireless' Complaints Per 1,000 Handsets Or Lines**

The Commission requires an ETC to annually report the total number of complaints and number of complaints per 1,000 handsets or lines for the most recent calendar year.<sup>3</sup> Assurance Wireless had 0.1151 complaints per 1,000 handsets for the 2015 calendar year.

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<sup>2</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(3).

<sup>3</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(4).

**C. Assurance Wireless' Certification Regarding Emergency Functionality**

The Commission requires an ETC to certify that it is able to function in emergency situations.<sup>4</sup> Virgin Mobile is an affiliate of Sprint Nextel Corporation ("Sprint"), provides service using the Sprint network and certifies that it is able to remain functional in emergency situations based on FCC Rule 54.202(a)(2). Sprint has a detailed Business Continuity Program that meets this requirement. The Business Continuity Program is the framework in which Sprint sets policies for network resiliency, the development and conduct of emergency preparedness exercises and the formation of its Emergency Response Team. Attached as **Attachment 2**, please find a copy of the Sprint Business Continuity Planning Program Overview.

**D. Assurance Wireless' Certification Regarding Its Provision Of A Comparable Local Usage Plan**

The Commission requires an ETC to certify that it has a local usage plan comparable to the incumbent LEC in the relevant service area.<sup>5</sup> Assurance Wireless's basic Lifeline service offering provides eligible customers with 350 anytime prepaid minutes and unlimited texts each month at no charge, with additional service priced at \$0.10/minute for local and long-distance calling and \$0.10/text message. Assurance Wireless Lifeline customers entirely at their option can purchase blocks of additional services. Under the first option, Lifeline customers can add \$5 to their account to purchase an additional 250 monthly minutes, providing them with a total of 600 voice minutes in a month (350 free minutes plus 250 additional minutes), plus unlimited texts. Under the second option, Lifeline customers can add \$30 to their account to purchase unlimited talk, text and web. The rates for service under all plans include all applicable taxes

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<sup>4</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(6)

<sup>5</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(7)

and fees, and customers can use their monthly minutes to place calls statewide (or even nationwide) because none of the plans imposes a local calling area requirement. Each service plan also includes voicemail, caller I.D. and call waiting services at no additional charge. Assurance Wireless also does not assess additional charges for activation or connection of Lifeline service. As a result, Lifeline customers will receive free service with no additional charges for taxes or activation. Accordingly, Assurance Wireless offers a variety of plans in South Carolina that do not have a limited calling scope. Assurance Wireless certifies that it offers a local usage plan comparable to the incumbent LEC in relevant service areas in South Carolina.

**E. Assurance Wireless' Certification Regarding The Requirement To Provide Equal Access**

As required by the Commission<sup>6</sup>, Assurance Wireless acknowledges that the Federal Communications Commission may require it to provide equal access to long-distance carriers in the event that no other ETC is providing equal access within one of its Service Areas.

**F. Number of Lifeline Customers**

The Commission requires ETCs to inform it of the number of customers receiving service in the prior year.<sup>7</sup> Assurance Wireless had 34,740 customers as of December 31, 2015.

**G. Copies of Responses to Lifeline Verification Survey or Certification filed with USAC**

The Commission requires ETCs to file copies of responses to the Lifeline Verification Survey or Certification filed with the Universal Service Administrative Company ("USAC") on

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<sup>6</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(8)

<sup>7</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(9)

August 31 of each year.<sup>8</sup> Attached as **Attachment 3**, please find a copy of Assurance Wireless's most recent Lifeline Verification Survey or Certification filed with USAC.

#### **IV. CONCLUSION**

Assurance Wireless respectfully requests that the Commission certify the Company's eligibility to receive high-cost universal service funds in accordance with 47 C.F.R. § 54.313.

Respectfully submitted,

s/John J. Pringle, Jr.  
John J. Pringle, Jr.  
Adams and Reese LLP  
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AND

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Counsel for Assurance Wireless

cc: Office of Regulatory Staff

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<sup>8</sup> 26 S.C. Code Ann. Regs. 103-690.1(B)(b)(10).

**Meredith Attwell Baker**  
President/CEO

July 30, 2015

Mr. Marcelo Claire  
President & Chief Executive Officer  
Sprint Corporation  
6200 Sprint Parkway  
Mailstop: KSOPHF0410-4A421  
Overland Park, KS 66251

Dear Marcelo:

Congratulations! This letter is to notify you that Sprint Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2015 – December 31, 2015, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Thomas Power, CTIA's Senior Vice President & General Counsel, at (202) 736-3669 or [tpower@ctia.org](mailto:tpower@ctia.org).

CTIA commends Sprint for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint on this important industry initiative.

Sincerely,



Meredith Baker

cc: Charles McKee, VP Government Affairs

Attachment

## SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

### LICENSE AGREEMENT

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

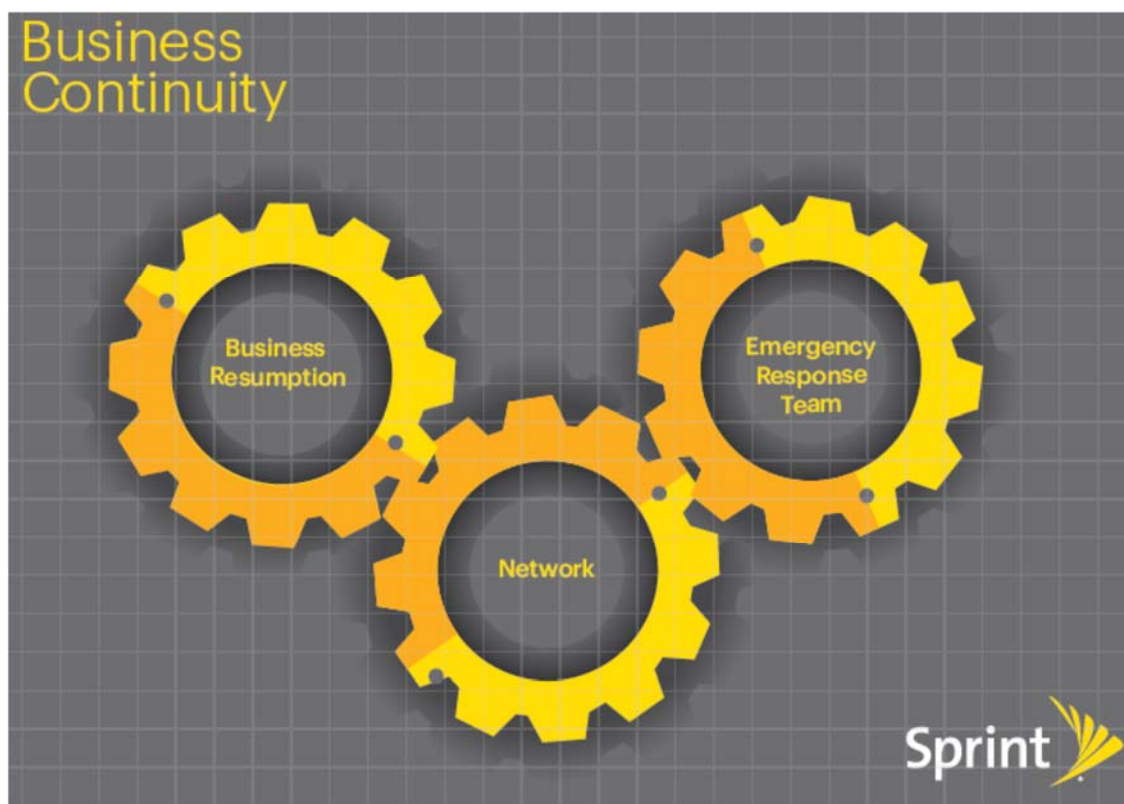
Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.



# Sprint Business Continuity Program Overview



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## Executive Summary

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of business continuity has never been more important. Sprint takes business continuity to the next level by ensuring that it is part of the corporation's business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees in their daily business operations to assure the continuation of Sprint's mission critical business operations and services. The goal of Sprint's Business Continuity (BC) Program is to minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Industry accepted principles are the basis for Sprint's Business Continuity (BC) Program. Sprint has adapted key principles from the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, and several Military Specifications (Mil-Spec) standards, into three BC Program Elements: Program Governance, Incident Management, and Continuity Analysis & Planning.

### Program Governance

Program Governance Structure— Program structure, mandate and executive sponsorship is required to ensure a comprehensive Business Continuity Program.

Program Management & Continuous Improvement - Overall program management and continuous improvement includes all of the documentation and efforts designed to ensure a well-defined BC program that seeks to continually mature performance and processes.

### Incident Management

Incident Management & Crisis Communications – Enterprise Incident Management Team (EIMT) and Incident Management Team (IMT) documentation, training, exercises and continuous improvement are required for those teams that have roles and responsibilities before, during or after an incident that significantly affects Sprint's employees, customers and/or shareholders.

### Criticality Analysis & Risk Mitigation Strategies

Criticality Analysis & Risk Management – Criticality Rating is necessary for prioritizing tasks and recovery. Risks that threaten the company's critical functions, vendors, sites, systems and network elements, require due diligence that result in decisions to mitigate or accept the risks.

Mitigation Strategies & Plan Development - After determining criticality and risks, the next steps include devising the appropriate mitigation strategies and recovery capabilities. BC plan development is formalized using on-line tools.

## Sprint's Business Continuity Program Has C-Level Sponsorship

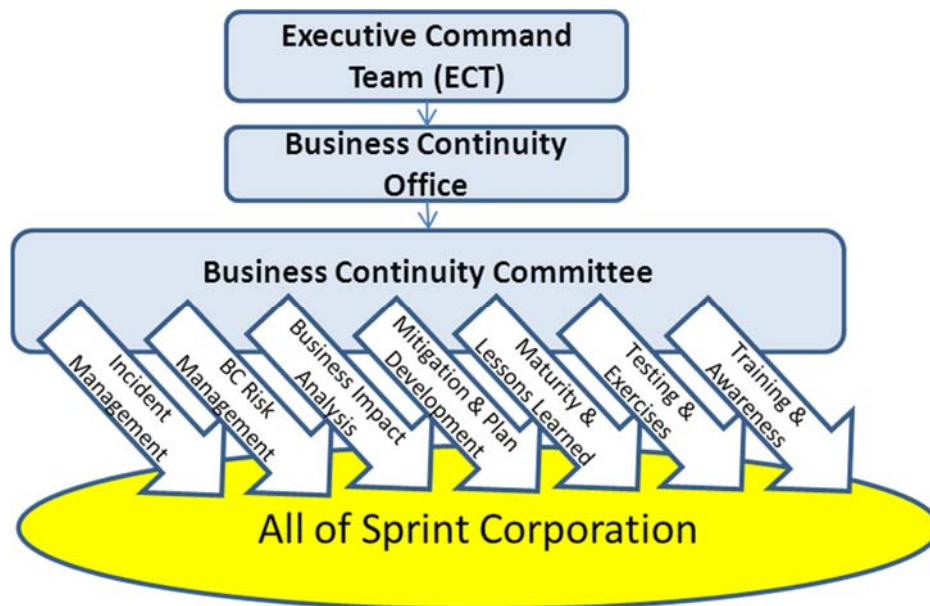
A comprehensive business continuity program requires executive sponsorship, a structure for decision-making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint. The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

**Executive Command Team (ECT)** - The ECT consists of Sprint's highest-level executives, representing all critical Sprint functions. The ECT receives briefings on issues and status of projects that require senior executive attention and provide executive sponsorship to the overall Business Continuity Program.

**Business Continuity Office (BCO)** - The BCO is the program office responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide BC and Disaster Recovery Plans. During an incident, the BCO is responsible for coordinating cross-functional incident management activities of the Enterprise Incident Management Team (EIMT).

**Business Continuity Committee (BCC)** – The BCC is comprised of Business Continuity Teams (BCTs). Consistency across the company for assuring business continuity policies, guidelines, standards and tools are the responsibility of the BCC. BCTs have overall responsibility for the implementation of business continuity initiatives within their individual business units and act as business unit Incident Management Teams (IMT) for their business units when disasters occur. The BCC has various sub-committees that focus on proactive planning, incident management, tools and training, awareness, pandemic planning and other issues that require attention.

### ***Program Governance Structure***



### **Program Management & Continuous Improvement Is Essential**

The concepts of program management and continuous improvement are the overarching control elements that bookend all other aspects of the BC Program. For each of the other Program Elements, Program Management efforts will provide definition of what the Program Element should accomplish and the methods used to achieve objectives. The continuous improvement efforts provide a means to keep the program elements evergreen, current, and striving for maturity.



#### **Program Management:**

- Awareness & Communications – Employees and management are informed of current business continuity efforts or awareness campaigns through internal communication methods that often target all employees in the company.
- Process, Standards & Documentation– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All key stakeholders are responsible for reviewing programs documents at least annually.
- Reporting – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.
- Maintenance – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.

#### **Continuous Improvement:**

- Training – To ensure familiarity with systems, processes and peer organizations use annual training cycles in addition to ad-hoc, training has new team members are added or procedure changes.
- Exercises – Sprint's response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are tabletop, walk-through, and functional drills.

Tabletop Exercises - In a round-table setting, members of the response team meet to discuss their responsibilities and describe how they would react as a team to an emergency scenario. They identify areas of overlap and confusion in a cost-effective and efficient manner.

Walk-Through Drills - Both management and the response team perform their emergency functions within the emergency response location.

Functional Drills - Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. In most cases, these functions should be tested separately to help identify improvement areas

- and to eliminate confusion. Observers are often used to evaluate these exercises.
- After Action Reviews (AARs) – Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.
- Maturity – Sprint uses an internally developed Maturity Model for benchmarking the Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

## **Sprint's Incident Management & Crisis Communications Teams Are Continually Trained**

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to all major disasters impacting the United States in the last 13 years.

**Executive Command Team (ECT)** – During a disaster, the ECT is kept apprised of all activities and status. If the incident requires chief executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions. The Chief Executive Officer (CEO) is the Chairperson of the ECT.

**Enterprise Incident Management Team (EIMT)** – The Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and built on the premise of an all-hazards response approach.

**Incident Management Teams (IMTs)** – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. Examples of IMTs include IT, Network, Human Resources, Customer Care, Corporate Security and others. In all, there are 16 IMTs, each of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT have a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

## **National Security & Compliance (NSC)**

The NS&C team works to improve the physical and cybersecurity of Sprint's critical infrastructure networks and facilitates information sharing within and across the communication industry as well as with the government. Today's threat environment reminds us of our imperative to protect our Nation's critical functions that support national and economic security and public safety. A partnership leveraging public and private sector capabilities is essential for providing a realistic approach for protection and response.

The NS&C team is the primary point of contact to the Department of Homeland Security during times of increased threat and attack and during significant all hazards events. Members of the NS&C team serve as Sprint's onsite representatives at the Department of Homeland Security's National Coordinating Center (NCC) for Communications to provide a line of communication between corporate leadership, other telecommunication providers and government officials. This public / private partnership supports the mission of the NCC who leads emergency communications response and recovery efforts under Emergency Support Function #2 of the National Response Framework.

## **Sprint Conducts Criticality Analysis & Develops Risk Mitigation Strategies for All Aspects of the Business**

Sprint formally analyzes risks and criticality of all parts of the business that could cause impacts or disruptions, if not properly mitigated and planned. These elements of the program ensure the proper priority and attention is applied to mitigation and plan development efforts.



**Criticality Analysis:**

Through various forms of analysis, such as Business Impact Analysis (BIA), criticality of business processes, applications, vendors, sites, network elements and other business aspects are determined. The criticality defines the appropriate level of mitigation and planning that is necessary. Critical business processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies.

**Risk Management:**

Sprint considers resiliency and business continuity risks to be a matter that requires tight management and controls. Determining appropriate mitigation and business continuity planning efforts based on evaluating potential risks using an internal algorithm.

**Mitigation Strategies & Plan Development:**

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. In most cases, the risks are marginalized or eliminated due to mitigation efforts. In some cases, the risks are highly improbable, but still require alternative planning, in the event that it should occur.

**Sprint's New Network Is Built for Survivability and Speed**

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

**Network Incident Management Team**

Network Services' implementation of the Incident Command System (ICS), stays true to the principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures, to communicate efficiently internally and with customers such as Public Safety agencies as many of these agencies utilize ICS as well. Teams train on and deploy in standard ICS sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as ruggedized GPS-enabled phones, wireless modems custom applications, M2M solutions, and smart phones to aid in response communication, situation assessment and resource tracking. The teams also maintain a pool of Satellite phones as a contingency for use in restoration. Teams continue to create innovative response tools, such as the unique backhaul Satellite Cell on Light Trucks (SatCOLTs) that enable restoration of service when a traditional backhaul is not available.

The Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation). A virtual Emergency Operations Center (EOC) is established and performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information, and performs executive notifications at prescribed times.

**Cell Site Disaster Planning**

Sprint's priority site restoration plan focuses resources and expedites recovery partly by making sure that existing infrastructure is operating properly under normal circumstances and by having a response plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. Sprint maintains a fleet of mobile generators deployable to Sprint service areas. Formal cell site classification designates all sites as critical, coverage and capacity sites. These prioritizations aid in properly allocating response personnel, generators and other resources.

### **Cellular Network Disaster Planning**

Communications from Sprint cell sites are backhauled with various combinations of ethernet, copper, fiber, and microwave systems. Most Sprint hub locations are placed on bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures, or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas, which often allow cell sites to fully or partially compensate for a neighboring cell site. Also in an effort to minimize service impact when a site is down, Sprint maintains a fleet of Cell Sites on Wheels (COWs) which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

### **Switch Disaster Planning**

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at switch locations. Switch locations have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes that readily connect the output of a portable generator in the event of primary generator issues.

### **Overall Network Performance Management Efforts**

The performance of Sprint's networks is monitored 24 hours a day, 7 days per week, and 365 days a year by the Network Monitoring Centers. In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained.

### **Network Restoration Prioritization**

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established cell site classification and service restoration process.

### **Special Event Planning**

Special events have the potential for adversely affecting the customer experience due to greatly increased wireless traffic demands. Sprint has a formal mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events for future planning, and proactively search for one-time special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has leveraged its experience in managing very large temporary users at NASCAR events in managing special events. As a specialized type of special event, Sprint also interfaces with the NCC (National Coordinating Center for Communications) in managing capacity needs at National Special Security Event, NSSE.

## **Sprint's Information Technology Is Resilient and Redundant**

### **Information Technology Incident Management Team**

The IT Incident Management Team (IT IMT) proactively integrates business continuity methodology into every phase of IT Operations business processes in order to facilitate rapid response and resolution to any critical Business disruption. The IT IMT process is developed to minimize the incident duration, expedite and control the recovery efforts. The IT IMT provides a structured approach for responding to unplanned incidents that threaten an IT infrastructure, which includes hardware, software, networks, processes and people.





During day-to-day operations, IT IMT is managed by and reports up through the IT line of business. The IT IMT is responsible for business continuity planning for all IT assets located in Data Centers, Sprint owned Call Centers, Retail Stores and general office facilities.

### **Information Technology Application Recovery Strategy**

IT IMT identifies and prioritizes the recovery of IT applications by using the Design for Criticality' (D4C) process which follows the business strategy of "Serve, Sell, Bill, Report". This criterion allows IT to assess and align each application based on the business function and impact to Sprint to a Design Class. An Application Alignment process will be used to determine the priority of the application in the recovery timeline. These priorities relate to the tolerance level of the applications and systems to the length of downtime after a disaster.

### **Data Center Resiliency Planning**

Sprint data centers containing IT assets are managed by IT resources are in scope for IT IMT planning and testing initiatives. The Sprint Data Centers are held to exceptionally high and stringent industry, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and serve as alternate site failovers for each other. Strategic IT vendors critical to Sprint operations are in scope for IT CPR planning solutions.

### **Sprint Owned Call Center IT Resiliency Planning**

Call Centers have proven failover processes. ITCPR is responsible for providing the centers with recovery planning for IT assets such as:

- Network
- Desktop
- Server
- Voice Technologies

### **Sprint Retail Store IT Resiliency Planning**

ITCPR provides support to Retail facilities by leveraging existing Sprint strategies to ensure functionality and communications between stores and the Sprint Enterprise

## **Sprint's Workforce Has Remote Work and Alternate Site Capabilities**

### **Employee Continuity Overview**

Sprint has implemented a strategic employee continuity plan that anticipates and prepares in the event there is a significant and sustained absenteeism. Examples include a pandemic, or infectious disease that poses life-threatening risks to employees and their families or an unplanned school closing due to a natural disaster or a man-made incident requiring parents to be absent from the work place.

Sprint's plan allows for flexibility and scalability to adjust to changing events. The plan also incorporates a wide range of strategies that are available for the business units while ensuring communication and information sharing on status and success.

### **Alternate Site and Remote Access Overview**

Sprint utilizes information obtained through business impact analysis and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event.

## **Sprint's Emergency Response Team (ERT) Is Ready to Serve**

### **Who is the ERT?**

The Sprint Emergency Response Team (ERT) is the first of its kind and was created in 2002. It has conducted more than 6,100 deployments, participated in over 300 training exercises, and provided emergency wireless support for close to 2,500 events.

Sprint's ERT is an experienced cross functional group, which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country. The ERT provides wireless telecommunications equipment, infrastructure and personnel operations support to federal, state and local public safety, law enforcement, military agencies and private sector organizations during declared emergencies, field training exercises, agency specific short term communication needs and National Special Security Events.

### **Support for Urgent Crisis Needs**

The ERT designs and implements the internal policies and procedures necessary to enable timely and effective deployments of Sprint's products and services. The ERT fully supports high volume, short notice voice and data communication needs of emergency, disaster personnel and communication liaisons with its SatCOLTs (Satellite Cell on Light Truck), Satellite IP VSAT Equipment, satellite earth stations, and inventory of over ten thousand handsets, aircards and mobile hotspots, which can be rapidly deployed to support short-term communications.

### **ERT in the EOCs**

During a number of recent disasters, ERT reservists staffed State and Local Emergency Operations Centers (EOC) to relay first-hand information back to agencies that rely on critical communications. Having reservist representation at EOC's is valuable for a number of reasons: Reservists provide real time information and status updates to the EOC's on the progress of our network recovery efforts ; Allows State EOC's to provide direction on priority areas for Network restoration; Coordinate information from other critical infrastructure functions, such as Energy/Power and Transportation; and obtain location of FEMA



and other emergency responder command posts using Sprint handsets to help plan for influx of capacity needs. The EOC initiative is an example of Sprint's proactive approach during an incident, through partnership, involvement and communications support. Partnering with Emergency Management agencies in cities and counties throughout the United States provides better coordination of Sprint and ERT support resources for Disaster Preparation and Response. Trained ERT Reservists are more actively involved in providing their communities with critical volunteer support. Agencies are able to have a direct channel into Sprint approved support organizations with more expedited response times and capabilities, providing critical communications support when needed the most.

**Contact The ERT:**

For more information on Sprint's Emergency Response Team, please visit us at [www.sprint.com/ert](http://www.sprint.com/ert), become a fan on Facebook at [www.facebook.com/SprintEmergencyResponseTeam](https://www.facebook.com/SprintEmergencyResponseTeam) email us at [ERTRequests@sprint.com](mailto:ERTRequests@sprint.com) or for emergency communications support, contact our 24x7x365 ERT Hotline at 1-888-639-0020 or for GETS users 254-295-2220.

**Annual Lifeline Eligible Telecommunications Carrier Certification Form**

All carriers must complete all or portions of all sections

Form must be submitted to USAC and filed with the Federal Communications Commission

**IMPORTANT: PLEASE READ INSTRUCTIONS FIRST**

**Deadline: January 31<sup>st</sup> (Annually)**

249013

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for **each** SAC through which it provides Lifeline service).

SC

State

Assurance Wireless

DBA, Marketing or Other Branding Name  
(If same as ETC name, list "N/A" Do not leave blank)

Virgin Mobile USA LP

ETC Name

Sprint Corporation

Holding Company Name  
(If same as ETC name, list "N/A" Do not leave blank)

**Does the reporting company have affiliated ETCs?**

Yes ☒

No ☐

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate by-laws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

**Section 1: Initial Certification** All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial JF

## Section 2: Annual Recertification

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

A	B	C	D	E = (A - B - C - D)
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year  (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year  (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
34442	0	1533	6849	26060

### Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non-responding subscribers	Number of subscribers responding that they are no longer eligible  (This should be a subset of Block G.)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
26808	24763	2045	353	2398

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
0	0

**Note:** If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

### Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial JF

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on: \_\_\_\_\_ . Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial \_\_\_\_\_

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial \_\_\_\_\_

### Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

$M = (F+K)$	$N = (J+L)$	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly <u>or</u> through a state administrator, ETC access to a state database, or by USAC (This should equal the number reported in Block E)	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
26808	2398	8.95%

### Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes ☒ No ☐

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	14
March	62
April	68
May	54
June	34
July	30
August	396
September	697
October	627
November	551
December	512
Total Subscribers	3045

### Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,  
Certified Online  
 Signature of Officer  
Jay.M.Franklin@sprint.com  
 Email Address of Officer  
Andy M. Lancaster  
 Person Completing This Certification Form

Jay M. Franklin, Assistant  
Controller

02/01/2016  
 Printed Name and Title of Officer  
913-762-6107  
 Date  
 Contact Phone Number